

**Federal Defenders
OF NEW YORK, INC.**

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June 12, 2023

BY ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: **United States v. Sharron Wayne**
22 Cr. 631 (PGG)

Dear Judge Gardephe:

I write, as counsel to Sharron Wayne in the above-captioned matter, to respectfully request a temporary modification of Mr. Wayne's pretrial conditions to allow him to attend a cookout in the backyard of his home to celebrate his birthday on Friday, June 16 from 4 to 8 pm. Pretrial services does not object to this request. The government defers to pretrial services.

On August 24, 2022, Mr. Wayne was presented in Magistrate Court. After a contested bail hearing, the following conditions were set:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pretrial services supervision as directed; home detention enforced by GPS location monitoring; no possession of any firearms or dangerous instruments; immediate urinalysis followed by drug testing and treatment if positive; surrender all travel documents with travel restricted to the Southern District of New York and the Eastern District of New York.

The Court granted Mr. Wayne's release on his signature on the bond with two weeks to meet the remaining conditions.

For the past nearly ten months, Mr. Wayne has remained in consistent compliance with the conditions of his release. In addition, he has been participating in virtual programming through

Osbourne, and regularly attending GED classes. Mr. Wayne now respectfully requests a temporary bail modification to celebrate his birthday with loved ones at a cookout in his backyard—essentially right outside of his apartment—from 4 to 8pm on June 16, 2023. The government and pretrial services do not object to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox
Assistant Federal Defender
(212) 417-8721

SO ORDERED:


THE HONORABLE PAUL G. GARDEPHE
United States District Judge

cc: Counsel of record

June 12, 2023